

Mr. Ted Matley  
FTA Region IX  
201 Mission Street, Suite 1650  
San Francisco, CA 94105

7-16-10



Dear Mr. Matley:

Subject: Faulty Noise Study in Honolulu Transit EIS

RE: Honolulu High Capacity Transit Corridor Project, Final EIS, 6-16-10

In the Final EIS (Appendix A) we finally received response to our comments on the DEIS and are disappointed. Unfortunately after the project is completed and the consultants and contractors move out, Oahu citizens could inherit massive class-action law suits based upon the trains being too noisy.

Here are samples of comments I made 1-1/2 years ago on the DEIS and responses just received from the transit team. I've had an acoustical engineering firm here in Hawaii for over 20 years.

The most important thing is to have reasonable background noise levels in your home wherein you can use normal voice, TV and radio sound levels when a train goes by. You should not have to use strained, loud voices to talk to each other or to raise your TV remote volume every time a train passes by. During the quiet night time you should not be awoken by train passes.

Improper transit noise studies could lead to many families suffering excessive noise inside their homes. There could be class action law suits after the mainland consultants and contractors are gone. The DEIS must address the additional noise impact caused by many homes now using natural ventilation year around with open lanai doors and windows and not the assumption that the 'typical' home has fenestration with standard mainland acoustical performance.

After litigation, many hundreds of homes could get the needed new windows and doors to close for reducing traffic and transit noise as well as the needed air-conditioning. Who pays for this and the extra electric bill costs? Who pays the attorneys fees?

Based on the DEIS report, I provide sample comments and technical questions which are numbered and underlined. The responses in the Final EIS from the C/C transit team are in italics. My comments on the responses are in bold.

E-2 Was the quality of fenestration in buildings considered since it includes:

a) open to closed sliding doors on lanais; b) open jalousies to closed jalousies with window AC units and c) open sliding glass windows to fixed glass windows with central AC.?

*"Considerations of the quality of building features would only be necessary if the features were obviously substandard conditions or quality and were unlikely to provide standard acoustical performance when closed. This is not the condition in the project area."*

Because of Hawaii's beautiful weather, there are many housing units with "obviously substandard conditions or quality", for example always-open windows and sliding glass doors and many other units which may have leaky жалousies and window air conditioners.

I have measured outdoor-to-indoor noise reductions of only 7dBA with opened glass louvered windows and open lanai sliding glass doors having direct line-of-sight to the noise source. For example, such conditions will exist along Salt Lake Blvd.

*"Standard acoustical performance when closed"* is assumed by FTA to be high quality window and doors with double glazing and quality seals yielding 20 to 25 dBA noise reduction. Thus the noise levels that many families will experience in their homes along the transit guideway will probably be two to three times noisier than predicted in the EIS.

F-1 Were any estimates calculated for noise levels inside typical homes along the guideway and, if so, what levels were found?

*"FTA criteria apply to outdoor human use areas: therefore indoor noise levels were not addressed."*

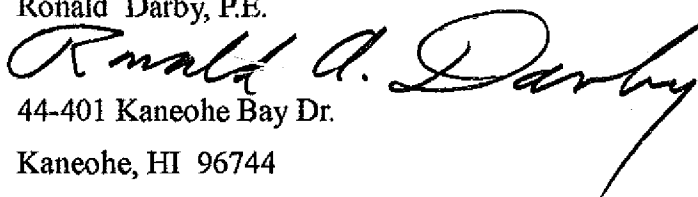
The EIS only considers the mandates of the Federal Transit Administration (FTA) which address only outside noise levels assuming that superior mainland-type closed windows and doors and seals will reduce the outside noise levels to acceptable inside noise levels for family living.

The actual noise impact on families will be much greater than the EIS shows. Also there will be greater costs in upgrading fenestration and providing air conditioning when necessary. The EIS study ignores the noise criteria for inside residential living of other agencies including HUD, FHWA and EPA.

The project should not proceed until a proper noise study and costing of realistic noise mitigation should be done.

Sincerely yours,

Ronald Darby, P.E.



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